

**NATIONAL ASSOCIATION OF THE DEAF**

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April 10, 1998

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APR 10 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Re: Comments of the National Association of the Deaf In the Matter of  
Petition of the Alliance for Public Technology Requesting Issuance of Notice of  
Inquiry and Notice of Proposed Rulemaking to Implement Section 706 of the  
1996 Telecommunications Act; RM-9844 7247

Dear Ms. Salas:

I have enclosed an original and four copies of the above referenced comments.  
Please contact me at the number listed above if you have any questions. Thank you for  
your assistance.

Sincerely,



Karen Peltz Strauss  
Legal Counsel for  
Telecommunications Policy

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
)  
Petition of the Alliance for Public Technology )  
Requesting Issuance of Notice of Inquiry and )  
Notice of Proposed Rulemaking to Implement )  
Section 706 of the 1996 Telecommunications Act )

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RM-9844  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS OF  
THE NATIONAL ASSOCIATION OF THE DEAF**

The National Association of the Deaf (NAD) hereby submits these comments in response to the above captioned petition filed by the Alliance for Public Technology (APT). The petition requests that the Federal Communications Commission (FCC) promptly issue a notice of inquiry and a notice of proposed rulemaking to accelerate deployment of advanced telecommunications capability.

The NAD is the nation's largest organization protecting the accessibility and civil rights of 28 million deaf and hard of hearing Americans in education, employment, health care, and telecommunications. The NAD is a private, non-profit federation of 51 state association affiliates, including the District of Columbia, organizational affiliates, and direct members. The NAD seeks to ensure a comprehensive, coordinated system of services that is accessible to Americans who are deaf or hard of hearing, enabling them to achieve their maximum potential through increased independence, productivity, and integration.

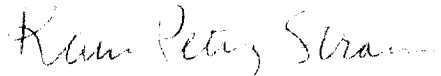
In a petition filed on February 1, 1998, APT urged the FCC to begin as soon as possible an inquiry and a rulemaking proceeding to consider proposals to eliminate barriers to deployment of high capacity bandwidth and to actively promote investment in the necessary infrastructure in accordance with the goals of Section 706 of the 1996 Telecommunications Act (the 1996 Act). That provision directs the Commission and state regulators to encourage, through the use of price caps, forbearance, measures that promote competition and other regulating methods that remove barriers to investment and the deployment of high-capacity bandwidth for two-way voice, data, graphics and video transmission using any technology

Advanced telecommunications technologies, such as video relay, can significantly enhance the quality of life for all Americans, particularly those with disabilities. As an example, video relay can become a critical communication tool for individuals using sign language, but only if the transmission occurs at the requisite modem speeds. The enormous benefits of that service, as well as telemedicine, distance learning, and telecommuting will only be realized if increased bandwidth and faster speeds are accessible and affordable to all citizens, including those with disabilities.

Therefore, the NAD supports APT's request for quick Commission action to facilitate deployment of potentially empowering technologies and agrees that a rulemaking proceeding will help to hasten their deployment to consumers who can benefit most from them. The FCC has just adopted a notice of proposed rulemaking to implement Section 255, which requires that all telecommunications products and services be accessible to individuals with disabilities. The NAD believes that a

rulemaking to implement Section 706 complements the Section 255 proceeding by enabling the Commission, as it considers ways to stimulate investment in advanced telecommunications capability, to develop regulatory assurances requiring that telecommunications providers make the services affordable and accessible to people with disabilities. Accordingly, we urge the Commission to grant the APT petition and issue notices of inquiry and of proposed rulemaking to facilitate the “reasonable and timely” deployment of advanced technology that Section 706 seeks to ensure for all Americans, including those with disabilities.

Respectfully submitted,



Karen Peltz Strauss  
Legal Counsel for Telecommunications Policy  
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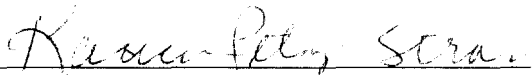
April 10, 1998

CERTIFICATE OF SERVICE

I, Karen Peltz Strauss, Legal Counsel for Telecommunications Policy at the National Association of the Deaf, hereby certify that on the 10<sup>th</sup> day of April, 1998, copies of the foregoing "Comments of the National Association of the Deaf" In the Matter of Petition of the Alliance for Public Technology Requesting Issuance of Notice of Inquiry and Notice of Proposed Rulemaking to Implement Section 706 of the 1996 Telecommunications Act; RM-9844, were hand delivered to:

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Maureen Lewis  
Alliance for Public Technology  
901 15<sup>th</sup> Street, N.W., Suite 230  
Washington, DC 20038-7146

  
\_\_\_\_\_  
Karen Peltz Strauss